

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Alto Maipo Delaware LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 21-11507 (KBO)
)
) (Jointly Administered)
)
)
)

**NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
MARCH 24, 2022 AT 11:00 A.M. (ET)**

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register no later than March 24, 2022 at 9:00 a.m. (ET).

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

https://debuscourts.zoomgov.com/meeting/register/vJltfu2oqTkqGeo7in2OUtH_yLtHZdStnD8

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

RESOLVED/ADJOURNED MATTERS

1. Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Dentons as Counsel to the Official Committee of Unsecured Creditors, Effective January 31, 2022 [[D.I. 303](#), 2/24/22]

Objection Deadline: March 10, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [[D.I. 356](#), 3/11/22]

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

- B. Order Authorizing the Employment and Retention of Dentors as Counsel to the Official Committee of Unsecured Creditors, Effective as of January 31, 2022 [D.I. 359, 3/14/22]

Objections Received/Filed: None

Status: An order has been entered. No hearing is required.

2. Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing Retention and Employment of Benesch, Friedlander, Coplan & Aronoff LLO as Delaware Counsel to the Official Committee of Unsecured Creditors [[D.I. 304](#), 2/24/22]

Objection Deadline: March 10, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [D.I. 357, 3/11/22]
- B. Order Authorizing the Retention and Employment of Benesch, Friedlander, Coplan & Aronoff LLP as Delaware Counsel to the Official Committee of Unsecured Creditors, *Nunc Pro Tunc* to February 1, 2022 [D.I. 363, 3/14/22]

Objections Received/Filed: None

Status: An order has been entered. No hearing is required.

3. Application of the Official Committee of Unsecured Creditors of the Debtor, Alto Maipo Delaware LLC, et al, for Order: (A) Authorizing Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor Effective as of February 8, 2022 [[D.I. 305](#), 2/24/22]

Objection Deadline: March 10, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. Certificate of No Objection [D.I. 358, 3/11/22]
- B. Order Authorizing Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor Effective as of February 8, 2022 [D.I. 361, 3/14/22]

Objections Received/Filed: None

Status: An order has been entered. No hearing is required.

4. Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 341](#), 3/7/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET), extended for certain parties to March 22, 2022

Related Documents:

- A. Senior Lenders' Joinder and Statement in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 374](#), 3/17/22]

B.

Objections Filed:

- A. Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 387](#), 3/18/22]

Status: This matter is adjourned to April 5, 2022 at 10:00 a.m. (ET).

CONTESTED MATTERS GOING FORWARD

5. SEALED - Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres [[D.I. 349](#), 3/10/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. REDACTED - Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres [[D.I. 350](#), 3/10/22]
- B. Declaration of Richard Minott in Support of (A) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief and (B) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with MLP [[D.I. 354](#), 3/11/22]
- C. Senior Lenders' Joinder to Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with MLP [[D.I. 375](#), 3/17/22]
- D. Statement in Support of (I) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP; and (II) Debtors' Motion for Entry of an Order Enforcing

the Automatic Stay and Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP [[D.I. 381](#), 3/17/22]

- E. Debtors' Reply to Limited Objection and Reservation of Rights of Specially Appearing Minera Los Pelambres to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 395](#), 3/21/22]
- F. Notice of Filing of Revised Proposed Orders Regarding (A) Debtors' Motion for Entry of an Order Pursuant to Section 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres; and (B) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief [[D.I. 397](#), 3/21/22]

Objections Filed:

- A. Limited Objection and Reservation of Rights of Specially-Appearing Minera Los Pelambres to (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 378](#), 3/17/22]

Status: This matter is going forward.

- 6. SEALED - Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (II) Granting Related Relief [[D.I. 351](#), 3/10/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. REDACTED - Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (II) Granting Related Relief [[D.I. 352](#), 3/10/22]
- B. Declaration of Richard Minott in Support of (A) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief and (B) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement with MLP [[D.I. 354](#), 3/11/22]
- C. Senior Lenders' Joinder to Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief [[D.I. 376](#), 3/17/22]

- D. Statement in Support of (I) Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With MLP; and (II) Debtors' Motion for Entry of an Order Enforcing the Automatic Stay and Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP [[D.I. 381](#), 3/17/22]
- E. Debtors' Reply to Limited Objection and Reservation of Rights of Specially Appearing Minera Los Pelambres to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 395](#), 3/21/22]
- F. Notice of Filing of Revised Proposed Orders Regarding (A) Debtors' Motion for Entry of an Order Pursuant to Section 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres; and (B) Debtors' Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Void Ab Initio Any Purported Termination of the Agreement by MLP, and (III) Granting Related Relief [[D.I. 397](#), 3/21/22]

Objections Filed:

- A. Limited Objection and Reservation of Rights of Specially-Appearing Minera Los Pelambres to (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 378](#), 3/17/22]

Status: This matter is going forward.

- 7. Debtors' Motion for Entry of an Order Authorizing Debtors to Redact Commercially Sensitive Information Relevant to the Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Mineral Los Pelambres and to File Under Seal the Declaration of Ariel Mihovilovic and Exhibits to the Declaration of Richard Minott [[D.I. 353](#), 3/10/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET)

Related Document:

- A. Debtors' Reply to United States Trustee's Objection to Debtors' Motion for Entry of an Order Authorizing Debtors to Redact Commercially Sensitive Information Relevant to the Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Minera Los Pelambres and to File Under Seal the Declaration of Ariel Mihovilovic and Exhibits to the Declaration of Richard Minott and Reservation of Rights of Specially-Appearing Minera Los Pelambres to the Debtors' (I) Motion to Assume Power Purchase Agreement and (II) Motion to Enforce the Automatic Stay [[D.I. 396](#), 3/21/22]

Objections Filed:

- A. United States Trustee's Objection to Debtors' Motion for Entry of an Order Authorizing Debtors to Redact Commercially Sensitive Information Relevant to the Debtors' Motion for Entry of an Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Approving Assumption of Agreement With Mineral Los Pelambres and to File Under Seal the Declaration of Ariel Mihovilovic and Exhibits to the Declaration of Richard Minott [[D.I. 380](#), 3/17/22]

Status: This matter is going forward.

Dated: March 22, 2022

Wilmington, Delaware

/s/ Sean T. Greecher

Pauline K. Morgan (No. 3650)

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